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November 24, 2015

Request to Approve Funding for 12 Months

CC Docket No. 02-6

**Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554**

To whom it may concern;

**Appellant Name: Cricky Cirillo, consultant for applicant.
Applicant: St. Rafael the Archangel School
Applicant BEN #: 92993
Applicant Form 471 #: 1012721**

We filed for 1 month worth of service instead of 12 months' worth of service. We did not catch our error until after the FCDL was received. We filed an appeal to have all 12 months approved but it was denied. We respectfully request that Application 1012721, FRN 2748701 be approved for 12 months so St. Rafael the Archangel School can receive E-Rate disbursements for all 12 months of telecom service.

Respectfully,

**Cricky Cirillo, for Richard Senturia, Consultant
Consulting Number 16048902
9666 Olive Blvd, Suite 215
Olivette, MO 63132
314-282-3675 direct line
314-395-5882 fax
cricky@erateprogram.com**



Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal – Funding Year 2015-2016

November 16, 2015

Cricky Cirillo
E-Rate Program LLC
9666 Olive Blvd, Suite 215
Olivette, MO 63132

Re: Applicant Name: ST. RAFAEL THE ARCHANGEL
Billed Entity Number: 16049054
Form 471 Application Number: 1012721
Funding Request Number(s): 2748701
Your Correspondence Dated: October 03, 2015

After review of the information and documentation provided, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of USAC's funding commitment decision for the FCC Form 471 Application Number and funding requests number(s) FRN(s)) referenced above. This letter provides an explanation for USAC's decision. The date of this letter also begins the sixty (60) day time period for appealing this decision. If your Letter of Appeal included more than one FCC Form 471 Application Number, please note that you will receive a separate decision for each funding application.

Funding Request Number(s): 2748701
Decision on Appeal: **Denied**
Explanation:

- During appeal review of your FCC Form 471 #1012721 you requested to increase your funding request. Program procedures allow applicants to amend their applications and correct ministerial and clerical errors on their FCC Forms until a Funding Commitment Decision Letter (FCDL) is issued. This change was not implemented because your request for changes/corrections was received after the associated FCC Form 471 #1012721 was committed and as such could not be processed. In your appeal, you did not show that USAC's determination was incorrect. Consequently, your appeal is denied.
- Your appeal requests additional funds that were not included in the FCC Form 471 that you are appealing. FCC rules require that funding requests must be submitted via an FCC Form 471. *See* 47 C.F.R. sec. 54.504(a). Considerations

for funding requests depend on the date the FCC Form 471 is received and the amount of funds available if it is received after the close of the filing window. *See* 47 C.F.R. sec. 54.507(f). The FCC directed USAC to allow applicants to amend their forms to correct clerical and ministerial errors on their FCC Forms 470, FCC Form 471 applications, or associated documentation until an FCDL is issued. Such errors include only the kinds of errors that a typist might make when entering data from one list to another, such as mistyping a number, using the wrong name or phone number, failing to enter an item from the source list onto the application, or making an arithmetic error. *See* Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6, Order, FCC 11-60 para. 5 (rel. April 14, 2011). Additional correctable errors can be found in the FCC Order DA 10-2354. *See* Requests for Waiver and Review of Decisions of the Universal Service Administrator by Ann Arbor Public Schools, Ann Arbor, Michigan, et al., Schools and Libraries Universal Service Support Mechanism, File Nos. SLD-542873, et al., CC Docket No. 02-6, Order, DA 10-2354 para. 2 (rel. December 16, 2010).

- The FCC's Bishop Perry Order directed USAC "to provide all E-rate applicants with an opportunity to correct ministerial and clerical errors on their FCC Form 470 or FCC Form 471, and an additional opportunity to file the required certifications" without posting new FCC Forms 470 and 471. *See* Request for Review of the Decision of the Universal Service Administrator by Bishop Perry Middle School, New Orleans, Louisiana, et al., Schools and Libraries Universal Service Mechanism, File Nos. SLD-487170, et al., CC Docket No. 02-6, Order, 21 FCC Rcd 5316-5317, FCC 06-54 para. 23 (May 19, 2006) (Bishop Perry Order). As a result, USAC sends an applicant a Receipt Acknowledgement Letter (RAL) when the FCC Form 471 has been successfully data entered and provides the applicant with an opportunity to make allowable corrections to its FCC Form 471. *See* Ministerial & Clerical Errors posted in the Reference Area of the SLD section of the USAC website. Per the FCC's directive, applicants should be allowed to amend their forms to correct clerical and ministerial errors until a Funding Commitment Decision Letter (FCDL) is issued. Such errors include only the kinds of errors that a typist might make when entering data from one list to another, such as mistyping a number, using the wrong name or phone number, failing to enter an item from the source list onto the application, or making an arithmetic error. *See* Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6, Order, FCC 11-60 para. 5 (rel. April 14, 2011). Additional correctable errors can be found in the FCC Order DA 10-2354. *See* Requests for Waiver and Review of Decisions of the Universal Service Administrator by Ann Arbor Public Schools, Ann Arbor, Michigan, et al., Schools and Libraries Universal Service Support Mechanism, File Nos. SLD-542873, et al., CC Docket No. 02-6, Order, DA 10-2354 para. 2 (rel. December 16, 2010). An applicant's request to remove entities from its application, when such removal would raise the average discount percentage for the relevant funding request above the funding threshold for that year, is not justifiable as a ministerial or clerical error. *See* Request for Waiver and Review of Decisions of the Universal Service Administrator by Alexander County School District, Taylorsville, North Carolina, et al., Schools and Libraries Universal Service Support Mechanism, File

No. SLD-827833 et al., CC Docket No. 02-6, Order, DA 13-1383 para. 2 (rel. June 14, 2013).

If you wish to appeal this decision, you may file an appeal pursuant to 47 C.F.R. Part 54, Subpart I. Detailed instructions for filing appeals are available at:
<http://www.usac.org/sl/about/program-integrity/appeals.aspx>.

We thank you for your continued support, patience and cooperation during the appeal process.

Schools and Libraries Division
Universal Service Administrative Company

● (Earthlink) USXchangeWisc lo/ld - 2748701

● Key Information

Duplicate Funding Request Number:

Service Type: VOICE SERVICES

Form470 Number: 476130001247658

Exempt470 Reason:

SPIN (Service Provider Identification Number): 143010549

SPIN Name: US Xchange of Wisconsin LLC

Billing Account Number: 7443900

Purchase Type: MONTHLY

When will the services start? 07/01/2015

When will the services end? 07/30/2015 6/30/2016

Narrative:

(Earthlink) USXchangeWisc lo/ld

Is there a statute, rule, or other restriction which prohibits publication of the pricing information? No

Type of restriction:

Restriction Citation:

● Item 21 Details

FRN Line Item Number	Service Type	Product Type	Purpose	Lines	Upload Speed	Burst Bandwidth?	Last Mile?	Firewall?	Monthly Cost Eligible	One Time Cost Eligible	Extended Cost
					Download Speed	Burst Speed		WAN?	Ineligible	Ineligible	
● 1	Voice Service	Local/Long Distance Service	Voice	2			No	No	\$204.75	\$0.00	\$204.75
								No	\$0.00	\$0.00	